



SEALED

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 1:22-cv-23342-WILLIAMS

UNITED STATES OF AMERICA,

ex rel.

WADE RINER,

Plaintiff,

vs.

. . . THE LOXAHATCHEE CLUB, INC., *et al.*,

Defendants.

FILED EX PARTE
AND UNDER SEAL
PURSUANT TO
31 U.S.C. § 3730 (b)(2)

STIPULATION OF DISMISSAL OF
DEFENDANT THE LOXAHATCHEE CLUB, INC.

Pursuant to Fed. R. Civ. P. 41(a) and the *qui tam* provisions of the False Claims Act, 31 U.S.C. § 3730(b)(1), and in accordance with the terms and conditions of the October 18, 2023 Settlement Agreement among the United States of America, Defendant The Loxahatchee Club, Inc., and Relator Wade Riner (the “Loxahatchee Club Settlement Agreement”), the United States and Relator hereby stipulate to the entry of an order:

- (1) dismissing with prejudice Defendant The Loxahatchee Club, Inc., as to the United States and Relator *only for the* Covered Conduct set forth in the Loxahatchee Club Settlement Agreement;
- (2) dismissing Defendant The Loxahatchee Club, Inc., from this action for any conduct *other than* the Covered Conduct set forth in the Loxahatchee Club Settlement Agreement, with prejudice to the Relator and without prejudice to the United States;
- (3) providing that the Court retain jurisdiction over The Loxahatchee Club, Inc. for 90 days with respect to any disputes that may arise regarding the Loxahatchee Club Settlement Agreement.

Relator, on behalf of himself, his heirs, successors, attorneys, agents, and assigns, further stipulates that the Settlement Amount set forth in the Loxahatchee Club Settlement Agreement and the terms and conditions described therein are fair,

adequate, and reasonable under all the circumstances, that he will not challenge the settlement pursuant to 31 U.S.C. § 3730(c)(2)(B), and that he expressly waives the opportunity for a hearing on any objection to the settlement under to 31 U.S.C. § 3730(c)(2)(B).

The United States of America and Relator Wade Riner respectfully request that the Court enter an order in the form of the proposed order.

Dated: the 2nd day of ~~October~~ ^{November}, 2023.

Respectfully submitted,

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